

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEVE SEGAL, et al.,

Plaintiffs,

-against-

RAYMOND BITAR, et al.,

Defendants.

Case No.: 11-cv-4521 (KNF)

KRISTIN LAWSON,

Plaintiff,

-against-

FULL TILT POKER, LTD. et al.,

Defendants.

Case No.: 11-cv-6087 (KNF)

ZAYN JETHA, et al.,

Plaintiffs,

-against-

FILCO, LTD. et al.,

Defendants.

Case No.: 11-cv-5519 (KNF)

NOTICE OF MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs Steve Segal, Todd Terry, Robin Hougahl, Nick Hammer, Zayn Jetha, Doug Whelan and Kristin Lawson hereby move this Court for an order: **(i)** granting preliminary approval of the Settlement reached by the Parties; **(ii)** conditionally certifying the settlement class; **(iii)** designating Plaintiffs as Class Representatives; **(iv)** appointing Wolf Haldenstein Adler Freeman & Herz LLP, Stone Bonner & Rocco LLP, and Finkelstein

Thompson LLP as Class Counsel for the Settlement Class; and (v) setting a date for the final fairness hearing.

This motion for preliminary approval of the Settlement is based upon this notice, the memorandum of points and authorities submitted herewith, the Affidavit of Thomas H. Burt, upon all papers and pleadings on file herein, and further evidence and argument as the Court may choose to entertain.

Dated: New York, New York
January 7, 2015

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